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June 18, 2012

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: IM Telecom, LLC d/b/a Infiniti Mobile Compliance Plan Meeting; WC  
Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On Wednesday, June 13, 2012, Trevan Morrow and Gregg Iser of IM Telecom, LLC d/b/a Infiniti Mobile ("IM Telecom"); Alex Rodriguez of CGM, LLC; and John Heitmann and Joshua Guyan of Kelley Drye & Warren, LLP met with Kimberly Scardino, Garnet Hanly and Divya Shenoy of the Wireline Competition Bureau ("Bureau") to discuss IM Telecom's Compliance Plan filed on April 16, 2012 in the above referenced dockets. IM Telecom's Compliance Plan was revised and re-submitted on June 7, 2012 and has been further revised and re-submitted today.

At the meeting, IM Telecom provided the Bureau staff with the enclosed presentation introducing IM Telecom and its management, the company's proposed Lifeline product offerings and its approach to compliance with the requirements of the *Lifeline Reform Order*.<sup>1</sup> The proposed Lifeline product offerings described in the enclosed presentation include a plan that IM Telecom no longer intends to provide (*i.e.*, the Oklahoma 1500 Plan). The revised Compliance Plan filed separately today includes IM Telecom's revised proposed Lifeline service offerings, among other things.

<sup>1</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch, Secretary  
June 18, 2012  
Page Two

This letter and presentation is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann  
Joshua T. Guyan

*Counsel to IM Telecom, LLC d/b/a Infiniti  
Mobile*

cc: Kim Scardino  
Divya Shenoy  
Charles Tyler  
Garnet Hanly



# FCC Overview Meeting

Telecommunications Access Policy Division

June 13, 2012



## Agenda

- Introduction of Companies
- Lifeline Product Offerings
- Marketing/ Advertising Compliance
- End User Enrollment
- Annual Certification
- Procedures for Controlling Waste, Fraud and Abuse
- Questions



- IM Telecom, LLC dba Infiniti Mobile History and Ownership
  - MWW, LLC – Retail stores for activations for other ETCs
  - HJS, Inc. – Wireless Phone programming and packaging distributor since 2000
  - Trevan Morrow Law Firm – Practicing firm since 1999
- Will provide Lifeline service in:
  - Oklahoma (ETC Hearing June 21)
    - [www.MyInfinitiMobile.com](http://www.MyInfinitiMobile.com)
- Current retail offerings
  - Multiple retail stores already open
  - Mobile outreach units



## Lifeline Product Offerings

- Infiniti Mobile is financially and technically capable of providing the supported Lifeline Service
  - History: Management team has activated over 10,000 accounts for other ETCs
  - Zero company debt
  - Key management experience
    - Owner & COO, Trevan Morrow
    - CEO, Gregg Iser



## Lifeline Product Offerings

Plan	Oklahoma 1000	Oklahoma 1500	Unlimited
Price	\$1 + taxes	\$3 + taxes	\$6.20 + taxes
Talk	500	500	Unlimited
Text	500	1000	No Text
Text Ratio	1 to 1	1 to 1	0 to 0

All plans include: Free phone, call waiting, caller ID, voice mail  
Free calls to 911 emergency services  
Free calls to customer service and balance inquiries  
Free domestic long distance calling



## Lifeline Product Offerings

In compliance with the amended section 54.202, Infiniti Mobile certifies

- It will comply with the service requirements applicable to the support that it receives
- It has the ability to remain functional in emergency situations
- It will satisfy applicable consumer protection and service quality standards
- It is financially and technically capable of providing Lifeline service





## Lifeline Product Offerings

- Public Safety and 911/ E911 Access:
  - Infiniti Mobile will ensure that all handsets used in connection with its Lifeline service are E911- compliant
  - Infiniti Mobile will provide its Lifeline customers with access to 911 and E911 services:
    - Through its underlying carriers, Verizon Wireless and Sprint PCS
    - At the time of Lifeline service initiation
    - Regardless of activation status and minute availability



## Marketing & Advertising Compliance

- In compliance with the marketing and disclosure requirements, all of Infiniti Mobile's marketing materials will include:
  - Disclose ETC's name under which it does business
  - Explain in clear, easily understood language the following:
    - The service is a lifeline service
    - Only eligible consumers may enroll in the program
    - That documentation is necessary for enrollment
    - The program is limited to one benefit per household, consisting of either wireline or wireless service
    - Infiniti Mobile's Lifeline application form will state that Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program
    - Lifeline service is non-transferable



## End User Enrollment

- Direct Sales – Electronic: Typically a face-to-face enrollment transaction occurring in retail store or at an event. All documentation can be witnessed in real-time and end user walks away with phone
- Direct Sales – Paper: Face-to-face enrollment in which enroller does not have access to real-time electronic validation. As such, phone must be shipped to end user after quality assurance department performs validation
- Internet Sales: Self-driven enrollment by end user who signs self-certification form electronically to complete transaction. Proof of identity and program eligibility must be mailed/faxed and received prior to shipment of phone
- Over-the-Phone Sales: Real-time, but proof of identity, program eligibility and completed self-certification form must be mailed/faxed and received prior to shipment of phone



## End User Enrollment

- Infiniti Mobile's Enrollment Process requires confirmation of these following 5 items:
  1. Confirms Applicant's Identity (see government issued picture ID)
  2. Confirm program or income eligibility (see proof of participation or annual household income)
  3. Confirm valid residence address and whether the address is permanent/ temporary or multi-household (Validates address via Melissa data)
  4. Confirms applicant is not currently receiving a subsidy from another carrier
    - Applicant certifies under penalty of perjury
    - Company performs duplicate check into an internal and pooled external database
  5. Confirm applicant receives handset and personally activates the phone prior to seeking reimbursement from Universal Service Fund



## Annual Recertification

- Infiniti Mobile will recertify each Lifeline end user annually
- All customers who fail to respond to recertification attempts within 30 days will be given a written notice that they have 30 days to confirm their eligibility or be de-enrolled from the Lifeline program
- Additionally, Infiniti Mobile will follow any state-specific recertification requirements



## Procedures for Controlling Waste, Fraud and Abuse

- Infiniti Mobile will assure compliance with all policies and procedures surrounding its Lifeline program
  - Marketing/advertising
  - End user initial enrollment and annual recertification
  - Mandatory monthly employee meeting to refresh training
  - Customer non usage and de-enrollment
  - Forensic fraud accountants
  - Will call consumers from the weekly activations and verify information
  - Collect drivers license number or other state ID and last 4 digits of social security number to prevent customers from enrolling for a second Lifeline service under a different name or ID



## Procedures for Controlling Waste, Fraud and Abuse

- Subscriber Usage:
  - 60 Day non-usage policy
- Duplicate Detection:
  - CGM
  - National Database (when operational)



Thank you

QUESTIONS?